Wenner, Rebecca

From:

Bredehoft, Deborah

Sent:

Wednesday, September 28, 2016 4:51 PM

To:

Wenner, Rebecca

Subject:

FW: CRT glass processing (Recycletronics in Iowa)

Attachments:

CVG1080 FINAL 07 24 12 1524.pdf; CVI1562 FINAL 10 02 12 925.pdf

From: Buckner, Edwin

Sent: Tuesday, September 22, 2015 3:00 PM

To: Bredehoft, Deborah

Subject: FW: CRT glass processing (Recycletronics in Iowa)

Edwin G. Buckner PE EPA Region 7 913-551-7621

From: Aycock, Jim

Sent: Tuesday, September 15, 2015 9:59 AM **To:** Buckner, Edwin < <u>Buckner.Edwin@epa.gov</u>>

Subject: FW: CRT glass processing (Recycletronics in Iowa)

FYI, in case you'd like to respond to Mr. Zach.

Jim Aycock
RCRA Enforcement/Compliance Officer
Waste Enforcement and Materials Management Branch
Air and Waste Management Division

U.S. Environmental Protection Agency 11201 Renner Blvd. Lenexa, Kansas 66219 Phone: 913-551-7887

Email: aycock.jim@epa.gov Fax: 913-551-7065

From: Zach, Donnie [mailto:donnie.zach@nebraska.gov]

Sent: Tuesday, September 15, 2015 9:57 AM

To: Aycock, Jim

Subject: FW: CRT glass processing (Recycletronics in Iowa)

Jim,

Just wanted to keep you updated on the Recycletronics sites in Iowa & Nebraska.

Below is an email between me and the owner, Aaron Rochester. I spoke with him numerous times. It appears all the CRT processing is taking place in lowa and they are just storing the crushed glass material in Nebraska. He said the crushed glass is a mixture of leaded and non-lead glass.

It sounds like he talked to Ed Buckner on Friday and Ed told him to do an analysis on the crushed glass.

RCRA

56122

We want to make sure he does an analysis of glass from CRT's alone prior to being mixed with any other glass.

NDEQ will likely be sending him a LOW for failure to do a hazardous waste determination on the crushed CRT glass that he brought into Nebraska.



Donnie Zach

NE Dept. of Environmental Quality Waste Management Compliance Phone - (402) 471-2175 1200 N Street P.O. Box 98922 Lincoln, NE 68509-8922

FOIA: PII

FOIA: PII

From: Aaron Rochester

Sent: Friday, September 11, 2015 8:56 AM

To: Zach, Donnie

Subject: Re: CRT glass processing

I will send pics later but below I put responses under each question. I would agree completely with your synopsis below.

From: "Donnie Zach" <donnie.zach@nebraska.gov>

To:

Cc: "Jeffery Edwards" < jeffery.edwards@nebraska.gov>

Sent: Friday, September 11, 2015 7:08:19 AM

Subject: CRT glass processing

Aaron.

In speaking with you yesterday, you informed me that CRT processing was taking place in Iowa and the crushed CRT glass was being brought to Nebraska and being stored on a cement pad and covered with a poly cover. You stated that the material would be stored over the winter and used in the future as a component in the production of landscaping block. You said that CRT crushing or processing was not taking place in Nebraska, simply the storage of the material for future use.

Could you please respond to this email with a full description of what is taking place? Be sure to include any pertinent information including the following:

- a.) Location of activities in Nebraska. Who owns the property? 2301 G Street South Sioux City, NE and is owned by DA Davis Co.
- b.) What background work did you complete prior to starting this process.....ie...contacts with city, county, etc....

Original Dennis, the one making the block, spoke to South Sioux City inspection services and showed them what we were doing and received approval as long as we were not making block on that sight but only storing. We called you after a disgruntled employee kept calling city hall and you complaining about what we were doing with allot of misinformation. Since yesterday that employee has been fired for conspiring to steal. He was turned in by 2 employees he spoke to about leaving our facility in Iowa open over the weekend.

c.) What does the crushed glass consist of? % lead CRT's & non-lead. Include any testing you have done with a description of exactly what was being tested.

CRT's consist of allot of non-lead, steel and funnel glass that has baked on lead onto the glass. The funnel is the thinner glass at the back of the tube. The T-Clip tests will be updated in the next few weeks but the ones from a few years ago are attached. We basically put a high concentration of the funnel glass in concrete and asphalt to make sure there was no leaching and that it was a safe and usable product.

d.) What is the plan for the material...ie..landscaping block only? If known, where will landscaping block production take place? Who will be producing the landscaping block?

Benson Brothers Co. will be making the block on his land just off 20 East on correctionville Rd. The plan is to make monster block and landscaping block starting in late spring of 2016.

e.) What is the overall timeframe for the project? How long do you anticipate the material being onsite in Nebraska?

The lease is for one year and Benson Bros own their own dump truck and skid loader with scoop so they can safely and efficiently bring the material over one truck load at a time. By this time next year the site should be empty.

If there is any other pertinent information that you can think of, feel free to include it. Photos of the Nebraska sight might be helpful as well.

The material will be brought over until Nov 1st and then we will have a permanent large water proof Polly cover over the aggregate through the winter until it is transported and used in the spring.

Thanks Aaron.

Donnie Zach

Program Specialist, Compliance Unit

Waste Management Section



October 02, 2012

Client:

RECYCLETRONICS DUAW

301 West 7th Street

Sioux City, IA 51103

Work Order:

CVI1562

Project Name:

TCLP Metals Only

Project Number:

Recycletronics DUAW

Attn:

Aaron Rochester

Date Received:

09/25/12

The Chain(s) of Custody, 2 pages, are included and are an integral part of this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-(800)750-2401

SAMPLE IDENTIFICATION

LAB NUMBER

COLLECTION DATE AND TIME

Lead Sand/Asphalt

CVI1562-01

09/24/12 12:00

Samples were received into laboratory at a temperature of 4.10 °C.

NELAC states that samples which require thermal preservation shall be considered acceptable if the arrival temperature is within 2 degrees C of the required temperature or the method specified range. For samples with a temperature requirement of 4 degrees C, an arrival temperature from 0 degrees C to 6 degrees C meets specifications. Samples that are delivered to the laboratory on the same day that they are collected may not meet these criteria. In these cases, the samples are considered acceptable if there is evidence that the chilling process has begun, such as arrival on ice.

Please refer to the Temperature and Sample Receipt form that is included with this report for additional information regarding the condition of samples at the time of receipt by the laboratory.

The reported results were obtained in compliance with the 2003 NELAC standards unless otherwise noted.

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the specific sample analyzed.

Approved By:

TestAmerica Cedar Falls

Linda Cmelik Project Manager



704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

RECYCLETRONICS DUAW

301 West 7th Street Sioux City, IA 51103

Aaron Rochester

Work Order:

CVI1562

Received: 09/25/12

Reported:

10/02/12 09:25

Project: Project Number: TCLP Metals Only Recycletronics DUAW

ANALYTICAL REPORT

Analyte	Sample Result	Data Qualifiers	Units	Quant Limit	Dilution Factor	Date Analyzed	Analyst	Reg. Limit	Method
Sample ID: CVI1562-01 (Lead San	d/Asphalt - Misc.	Solid)			Sampled:	09/24/12 12:00	Rec	vd: 09/25	/12 08:50
CLP Metals									
Lead	< 0.100		mg/L	0.100	1	09/27/12 15:24	cjt	5	SW 6010B
TCLP Extraction by EPA 1311									
TCLP Extraction Temp. Minimum	21.6		°C	NA	1	09/26/12 08:40	jdb		SW 1311
TCLP Extraction Temp. Maximum	22.9		$^{\circ}C$	NA	1	09/26/12 08:40	jdb		SW 1311



704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

RECYCLETRONICS DUAW

301 West 7th Street

Sioux City, IA 51103

Aaron Rochester

Work Order:

CVI1562

Received:

09/25/12

Reported:

10/02/12 09:25

Project:

TCLP Metals Only

Project Number:

Recycletronics DUAW

SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracted	Extracted Vol	Date	Analyst	Extraction Method
TCLP Metals SW 6010B	1211262	CVI1562-01	50.00	50.00	09/26/12 16:18	JCM	SW 3010A - TCLP

	TestAmerico		Cedar F 704 Ente Cedar F	erpris	se Dr IA 50	ive F 613	ax	319-	277	-242	1 or 1	800-	-750-2	401			is this v	st us in u work bei Complia	ing con	ducted	for regi	ical met	hods, ourpose	es?
	Client Name: RCC 7 Address: 301	cle	reni	cs	C1	DUF	W		CI	ient	#:					Drainat I	lama:							
	Address: 301	WEST.	77		> 15	eet			_		_				,									
	City/State/Zip Code:	11	17,	I	4_	511	3				1	_												
	Project Manager: Anna	1	Knck	est	es										Sit									
FOIA: PII							2 =																	
	Telephone Number:						_ 1	Fax: _																
9	ampler Name: (Print Name)	24	Rac	he s	to				_		_		_			Q	uote #:					PO#:		
	Sampler Signature: Law	1 /2	als	The							_													1
	Sampler digitators.	7				Matrix	Presen	ration	�	of Co	ntain	ers				_	Analy	ze For:		_	1		_	QC Deliverables
	TAT Standard Rush (surcharges may apply)			G = Grab, C = Composite		SLSludge DWDrinking Water GWGroundwater SSoil/Solid WWWastewater Specify, Other																		None Level 2 (Batch OC) Level 3
	Date Needed:	_	ъ	S		W - C					1		/-	/	/	/		/		/	/		1	Level 4
	Fax Results: Y N	Date Sampled	Time Sampled	O,	Field Filtered	undw.						Other (Specify)		/		/	/		/	/		/	/	Other:
	Email Results: Y N	Sar	Sar	Grab	E E	Sludg - Gro	2	I	o	Methanol		er (Sp	/	1	/		/		1	/	/	/ -	/	REMARKS
	SAMPLE ID	Date	Ĕ	5	Field	SL- GW	N N	NaOH	H2 SO.	Met	None	ð		_		_	_	_	-			-		REMARKS
		1/24/12	1200					_				_		_	-	-	-	-		-	+	-	_	
	24.16.2		,					_	L			_		<u> </u>	_	+-	-	-	-	-	+	-	-	
								\perp	L			Н		-	-	+-	-	-	-	-	+	-	-	
								1	1	\perp		Н			_	+-	-	-	-	-	+	-	_	
								1	_	_	Н	Н		-		-	-	-	-	-	+	-	_	
							\perp	1	1	_		Н	_	-	├	+-	-	-	-	-	\vdash	+-	-	
				_	Ш		1	+	-	-	\vdash	Н	_	-		+-	\vdash	+	-	-	+	1	\vdash	
				_			-	+	-	-	-	Н	-	-		+-	+-	+-	+-	-	+-	-		
				1	_		\vdash	+-	-	-		Н		-	-	+	+	+-	1		+-	+	\vdash	
									_				L					1	LABO	PRATO	MY CO	MMENT	S:	10000000000000000000000000000000000000
	Special Instructions:									-	A o		~			-	/	- \	8	- 2	545	, {	2	e ave lo
	Relinquished By:		Date:		Time	e:	Rece	ived B	By:	11	Re	W	Sex.	lier	Date:	9/3/	Time	150	P	۸ (Ja	non.	ly.	OF GAR
	Relinquished By:		Date:		Time	9:	Rece	ived E			_				Date:	/	Time:		α	ma	ly 2	2 -	S.	TICUS
	Belinguished By:		Date:		Time	e:	Rece	eived	Ву:		_				Date:		Time		32.54		i de			TAL-0033 (0708)



704 Enterprise Drive • Cedar Falls, IA 50613 800-750-2401 • 319-277-2425 Fax

Sample Receipt and Temperature Log Form

Client: Recycle	etronics	_ Pr	oject:	-
City:	ceiver's Initials: _(CH	Time (Delivere	d): 8:50
Temperature Record:	Thermometer:		Courier:	
Cooler ID# (If Applicable) 4, °O On Ice Temp Blank Temperature out of cor	IR - 111531565 'D IR - 111531506 'E IR - 61854108 'Fr 101681126	eront'	☐ FedEx ☐ FedEx Ground ☐ US Postal Service ☐ Spee-Dee	TA Courier TA Field Services Client Other
Custody seals present? Yes Custody seals intact? Yes No Non-Conformance research	eport started	Sa Sa	ceptions Noted ample(s) not received is amples(s) received san Evidence of a chilling to Temp. Blank. Inside tooler recorded.	ne day of sampling. g process
	1	1 <u>2222</u>		

*Refer to SOP CF-SS-01 for Temperature Criteria



October 02, 2012

Client:

RECYCLETRONICS DUAW

301 West 7th Street

Sioux City, IA 51103

Attn:

Aaron Rochester

Work Order:

CVI1562

Project Name:

TCLP Metals Only

Project Number:

Recycletronics DUAW

Date Received:

09/25/12

The Chain(s) of Custody, 2 pages, are included and are an integral part of this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-(800)750-2401

SAMPLE IDENTIFICATION

LAB NUMBER

COLLECTION DATE AND TIME

Lead Sand/Asphalt

CVI1562-01

09/24/12 12:00

Samples were received into laboratory at a temperature of 4.10 °C.

NELAC states that samples which require thermal preservation shall be considered acceptable if the arrival temperature is within 2 degrees C of the required temperature or the method specified range. For samples with a temperature requirement of 4 degrees C, an arrival temperature from 0 degrees C to 6 degrees C meets specifications. Samples that are delivered to the laboratory on the same day that they are collected may not meet these criteria. In these cases, the samples are considered acceptable if there is evidence that the chilling process has begun, such as arrival on ice.

Please refer to the Temperature and Sample Receipt form that is included with this report for additional information regarding the condition of samples at the time of receipt by the laboratory.

The reported results were obtained in compliance with the 2003 NELAC standards unless otherwise noted.

Reproduction of this analytical report is permitted only in its entirety. This report shall not be reproduced except in full without the written approval of the laboratory.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the specific sample analyzed.

Approved By:

TestAmerica Cedar Falls

Linda Cmelik

Project Manager



704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

RECYCLETRONICS DUAW

301 West 7th Street

Sioux City, IA 51103 Aaron Rochester Work Order:

CVI1562

Received: 09/25/12

Reported:

10/02/12 09:25

Project: Project Number: TCLP Metals Only Recycletronics DUAW

ANALYTICAL REPORT

					22				
Analyte	Sample Result	Data Qualifiers	Units	Quant Limit	Dilution Factor	Date Analyzed	Analyst	Reg. Limit	Method
Sample ID: CVI1562-01 (Lead Sand	l/Asphalt - Misc.	Solid)			Sampled:	09/24/12 12:00	Rec	vd: 09/25	6/12 08:50
TCLP Metals									
Lead	< 0.100		mg/L	0.100	1	09/27/12 15:24	cjt	5	SW 6010B
TCLP Extraction by EPA 1311									
TCLP Extraction Temp. Minimum	21.6		°C	NA	1	09/26/12 08:40	jdb		SW 1311
TCLP Extraction Temp. Maximum	22.9		°C	NA	1	09/26/12 08:40	jdb		SW 1311



704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

RECYCLETRONICS DUAW

301 West 7th Street Sioux City, IA 51103

Aaron Rochester

Work Order:

CVI1562

Received:

09/25/12

Reported:

10/02/12 09:25

Project:

TCLP Metals Only

Project Number:

Recycletronics DUAW

SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracted	Extracted Vol	Date	Analyst	Extraction Method
TCLP Metals SW 6010B	1211262	CVI1562-01	50.00	50.00	09/26/12 16:18	JCM	SW 3010A - TCLP

	TestAmerico THE LEADER IN ENVIRONMENTAL TEST	C	edar Falls 04 Enterpri edar Falls,	ise Dri	ve F 513	ax	319-	277-2	425			-2401			is this v	work bei	using the ing cond ance Me	ducted	for regu	ical meth	ods, urposes	?	
	Client Name: Rec.	y clet west x cit	7th	514	eet	W		Clie	nt#:	_	_			Project	Name:								
	Address:	x cit	5 I	A	511	3																	
	/	an A	Coches	tor		_							Sit	e/Locat	ion ID:						State: _		
FOIA: PII	1 Tojook Illians	4 1	CITCH !	. (/_																			
	Email Address: _													Invo	ice To:								
	Telephone Number:	127	Rache	(+0-										Q	uote #:					PO#:			
			alite	5.0									-										
	Sampler Signature:	J. 12	wayes		Matrix	Drosen	vation	& # of	Conta	niners	5				Analy	ze For:			, , ,		\Box	QC Deliverables	
	TAT Standard Rush (surcharges may apply) Date Needed: Fax Results: Y N Email Results: Y N SAMPLE ID	Date Sampled	Time Sampled G = Grab, C = Composite	Field Filtered	doge DW - Drinking water sroundwater S - Soil/Solid Wastewater Specify Other	SONI C	I			(Specify)										<i>\\</i>		None Level 2 (Batch OC) Level 3 Level 4 Other:	
									+														
	Special Instructions:								+								LABC	RATO	ny co	MMENT	s :		
									,	,	_						O	. J.	つくう	190			
	Relinquished By:		Date:	Time:	:	Rece	ived B	y: 1		Par	, X	elias.	Date:	105/	Time	150	A	. C	lai	*	اوبا	1009 k	Υ
	Relinquished By:		Date:	Time:	:	Rece	ived B	у:		_			Date:		Time:		a	~a	ly 2	2 4	Sn.	ACOL I	5
	Relinquished By:		Date:	Time	:	Rece	eived E	Зу:		_			Date:		Time:		-1			数 编 编		TAL-0033 (0708)	



704 Enterprise Drive • Cedar Falls, IA 50613 800-750-2401 • 319-277-2425 Fax

Sample Receipt and Temperature Log Form

Client: Recycl	etronics	Pr	oject:			
City:	ceiver's Initials:	<u>+</u>	Time (Delivered	d): 8:50		
Temperature Record:	Thermometer:	r	Courier:			
Cooler ID# (# Applicable)	IR - 111531565 'D'		<u>UPS</u>	TA Courier		
Styro	IR - 111531506 'E'		FedEx	TA Field Services		
	IR - 61854108 'Fron	nť	FedEx Ground	Client		
4. On Ice	101681126		US Postal Service	Other		
			Spee-Dee			
Temp Blank						
Temperature out of co	mpliance		×			
	Γ-		ceptions Noted			
Custody seals present?		S	ample(s) not received in	n a cooler.		
Yes Custody seals intact? Yes No	, [S	amples(s) received san	ne day of sampling.		
Non-Conformance	report started		Evidence of a chilling	g process		
rear demonstrate		C. C	lo Temp. Blank. Inside ooler recorded.	temperature of		
]	Т	emperature not taken:			

*Refer to SOP CF-SS-01 for Temperature Criteria